REMARKS

Favorable reconsideration of this application, in light of the following discussion, is respectfully requested. Claims 1-7, 9-16, and 19 remain pending in the present application.

By way of summary, the Office Action rejected Claims 1-7, 9-16, and 19 under 35 U.S.C. § 103(a) as obvious over U.S. Patent No. 6,757,708 to Craig et al. (hereinafter "Craig") in view of U.S. Patent No. 6,681,298 to Tso et al. (hereinafter "Tso"), U.S. Patent App. Publ'n No. 2002/0002625 to Vange et al. (hereinafter "Vange"), and U.S. Patent No. 6,986,018 to O'Rourke et al. (hereinafter "O'Rourke").

STATEMENT OF SUBSTANCE OF INTERVIEW

Applicants and Applicants' representative wish to thank Examiner Truong for the courtesy of the telephonic interview granted on March 10, 2011. During the interview, arguments directed to Claims 1 and 19 were presented. In particular, a non-limiting example of a vendor was discussed.[1] Comments similar to those presented during the interview are included herein.

REJECTIONS UNDER 35 U.S.C. § 103

Because no proper combination of Craig, Tso, Vange and O'Rourke discloses or suggests the features of independent Claims 1 and 12-14, Applicants respectfully traverse the rejection thereof.

Independent Claim 14 is directed to an information processing apparatus including, in part,

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[1] The Interview Summary states, "Applicant[s] argued that the recited limitation ['vendor'] refers to a particular website." The Interview Summary's characterization apparently arose from a miscommunication, as the claims do not require that a vendor refer to a particular website.

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> a network device that . . . receives . . . identification information . . . , the identification information identifying a vendor; . . . and
>
> a controller configured to register . . . , in response to the identification information, . . . content data in an uncompressed format upon a reception of said content data in a compressed format . . . , and to remove all files from [a] memory except for files of the vendor.

Craig, Tso, Vange, and O'Rourke fail to disclose or suggest those features.

Craig concerns a computer system for caching dynamically generated content.[2] The Office Action acknowledged, "Craig fails to specifically disclose . . . control means for registering . . . , in response to the identification information, said content data in an uncompressed format upon a reception of said content [data] in a compress[ed] format . . . and the identification information identifying a vendor," as recited in Claim 1.[3] Applicants submit Craig similarly fails to disclose or suggest "a controller configured to register . . . , in response to . . . identification information, . . . content data in an uncompressed format upon a reception of said content data in a compressed format," "the identification information identifying a vendor," as recited in independent Claim 14.

Vange concerns a response reformat component 406 that determines that reformatting is appropriate "when [a] response includes a graphic format that cannot be interpreted by [a] client . . . or may not be appropriate to forward to [the] client . . . due to constrained bandwidth."[4] Further to Vange, the response format "Component 406 is optionally used to implement data decompression where appropriate . . . ."[5]

That is, Vange merely describes a reformatting due to constrained bandwidth or when a graphic format cannot be interpreted. Vange does not disclose or suggest reformatting in

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[2] Craig, col. 1, ll. 6-10.
[3] Office Action at 5.
[4] Vange, para. [0072].
[5] Id.

response to identification information identifying a vendor. Vange does not disclose or

suggest "a controller configured to register . . . , in response to . . . identification information,

. . . content data in an uncompressed format," "the identification information identifying a

vendor," as recited in independent Claim 14.

Tso concerns a set top box system in which, "if the set top box includes hardwired or

hardware accelerated circuits for decompressing MPEG images, the decompressed images

can be deleted . . . ."[6] Tso does not disclose or suggest when the MPEG images are

decompressed.

Tso does not disclose or suggest "a controller configured to register . . . , in response

to . . . identification information, . . . content data in an uncompressed format," "the

identification information identifying a vendor," as recited in independent Claim 14.

O'Rourke is directed to cache policies "defined based on an administrator's

knowledge of . . . origin servers . . . in [an] environment in which [a] cache server is

located."[7] According to O'Rourke, a "cache policy may dictate that the cache server can only

cache content from specific origin servers (e.g., origin servers owned by a particular company

or organization)."[8]

That is, O'Rourke merely describes caching content based on an administrator's

knowledge of the cache server's environment. O'Rourke does not disclose or suggest "a

controller configured to register . . . , in response to . . . identification information, . . . content

data in an uncompressed format upon a reception of said content data in a compressed

format," "the identification information identifying a vendor," as recited in independent

Claim 14.

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[6] Tso, col. 7, ll. 11-14.
[7] O'Rourke, col. 7, ll. 45-48.
[8] Id., ll. 58-61.

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Thus, <u>Craig</u>, <u>Vange</u>, <u>Tso</u>, and <u>O'Rourke</u>, taken alone or in combination, fail to disclose or suggest "a controller configured to register . . . , in response to . . . identification information, . . . content data in an uncompressed format upon a reception of said content data in a compressed format," "the identification information identifying a vendor," as recited in Claim 14.

Further, as discussed during the interview, the Office Action advanced the interpretation that a vendor refers to a particular company that created a file type such as JPEG (e.g., Joint Photographic Experts Group). Meanwhile, the Office Action relied on the <u>O'Rourke</u> description of an origin server owned by a particular company or organization as describing a vendor.[9]

As will be appreciated, a company that created a file type might bear no relation to a company owning a server from which a file of that type might be received. Accordingly, it would not have been obvious to the skilled artisan to modify the registration of content data in an uncompressed format based on an origin server from which compressed content data was received. Indeed, the Office Action articulated no reasoning for the proposed modification.[10]

Further, the Office Action proposed to modify <u>Tso</u> based on the description in <u>O'Rourke</u> of caching content only from specific origin servers. In particular, the Office Action proposed,

> by designating a low removal factor to web pages from a
> particular vendor, those files from the vendor are removed,
> likewise those web pages from a particular vendor set with [a]
> highest removal factor are kept. Therefore by modifying
> Tso['s] system to recognize a particular vendor, the system can

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[9] Office Action at 6.

[10] <u>Contra</u> MPEP § 2141 III ("The Court . . . stated that '"[R]ejections on obviousness cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness.'" *KSR [Int'l Co. v. Teleflex Inc.]*, . . . 82 USPQ2d [1385,] 1396.")

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> choose to keep only those files from the vendor when removing
> files by indicating the highest removal factor which allows
> deletion of files not from a designated vendor.[11]

The Office Action provided no evidence that would have rendered obvious the proposed modification. For example, none of the applied references discloses or suggests setting web pages from a particular vendor with a high removal factor. Additionally, whereas Tso describes *deleting* MPEG images, the Office Action provided no rationale rendering obvious modifying the Tso system to *keep* only content from a specific *server*.

For at least the foregoing reasons, independent Claim 14 (and all associated dependent claims) patentably distinguishes over any proper combination of Craig, Vange, Tso, and O'Rourke.

For at least analogous reasons, independent Claims 1 and 12-13 patentably distinguish over any proper combination of Craig, Vange, Tso, and O'Rourke.

It is additionally submitted dependent Claim 19 further defines over Craig, Vange, Tso, and O'Rourke. In part, Claim 19 recites, "when a number of files cached . . . exceeds a predetermined threshold, the controller removes all files . . . except for the files of the vendor."

In rejecting that feature, the Office Action stated, "web pages from a particular vendor set with [a] highest removal factor are kept when [a] size of the cache hits or exceeds the memory threshold . . . ."[12] As discussed above, no reference discloses or suggests setting web pages of a particular vendor with a high removal factor.

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[11] Office Action at 6-7.
[12] Id. at 14.

Further, O'Rourke merely describes only caching content from specific origin servers.[13] O'Rourke does not disclose or suggest a timing for removing files except for files of the specific origin servers.
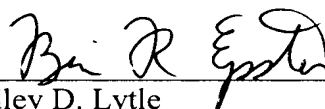
For at least those reasons, dependent Claim 19 further defines over any proper combination of Craig, Vange, Tso, and O'Rourke.

CONCLUSION

Consequently, in light of the foregoing comments, it is respectfully submitted the present application is patentably distinguished over the applied references. The application is therefore in condition for allowance, and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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[13] O'Rourke, col. 7, l. 59.

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